

3. This action is being removed to Federal District Court on the basis of diversity jurisdiction as allowed by 28 U.S.C. § 1332.

4. The United States District Court for the Northern District of Alabama, Southern Division, has original jurisdiction under 28 U.S.C. § 1332. This action is removable under 28 U.S.C. § 1441.

5. This Court has jurisdiction under 28 U.S.C. § 1332, and removal is proper pursuant to 28 U.S.C. § 1441, because there is diversity of citizenship with regard to all properly joined properties. The Plaintiff, Robert Till, is a citizen of the State of Texas. Defendant Barraq Alquza is a citizen of the State of California. Defendant Uber Technologies, Inc. is incorporated in Delaware and has a principal place of business in California. As such, complete diversity of citizenship exists.

6. The amount in controversy requirements are met in this action. On March 17, 2022, former counsel for the Plaintiff provided to the Defendant communications from the Plaintiff's treating physician indicating that Plaintiff Robert Till would require surgery in the future as a result of the incident made the basis of this lawsuit. That communication indicated that Mr. Till already had a medical bill balance of approximately \$47,500.00, and expected future costs in the range of \$120,000.00 to \$180,000.00. As the injuries leading to that treatment are claimed to have been caused by the accident made the basis of this lawsuit, there is no question that the amount in controversy exceeds \$75,000.00.

7. This Notice of Removal and other accompanying papers and notices have been served upon all counsel of record and adverse parties and filed with the Clerk of the State of Court from which this action is being removed, the Circuit Court of Jefferson

County, Alabama, as required by 28 U.S.C. § 1446(d). A copy of said Notice of Filing Notice of Removal is attached hereto as Exhibit “B.”

8. This Notice is signed pursuant to Rule 11 of the Federal Rules of Civil Procedure, as required by 28 U.S.C. § 1446(a) as amended, which eliminates the requirement for a verified petition.

9. A copy of all pleadings, papers, Notices, and Orders, served upon the Defendant and which consist of the Record of the Clerk of the Circuit Court of Jefferson County, Alabama, have been attached hereto as Exhibit “A.”

10. For the reasons stated herein, this Federal District Court has jurisdiction of this case pursuant to 28 U.S.C. § 1332 and the case is properly removed pursuant to 28 U.S.C. 1441.

11. All Defendants consent to the removal of this action to federal court.

Respectfully submitted,

s/Joseph E. Stott
JOSEPH E. STOTT - STO041 (ASB-4163-T71J)
Attorney for Defendant Barraq Alquza

OF COUNSEL:

Stott & Harrington, P.C.
2637 Valleydale Road, Suite 100
Birmingham, AL 35244
(205) 573-0500
(205) 637-5131 Fax#
joe@stotharrington.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

ROBERT TILL,

Plaintiff,

VS.

**BARRAQ ALQUZA; and
UBER TECHNOLOGIES, INC.,**

Defendants.

Case No.: _____

CERTIFICATE OF SERVICE

I hereby certify that I have on April 28, 2022 served a copy of the foregoing on the following attorneys of record via CM/ECF and/or by placing a copy of same in the U.S. Mail:

Brett H. Hollett, Esq.
Turnbull, Holcomb & LeMoine, PC
2101 6th Avenue North, Suite 1100
Birmingham, Alabama 35203
bhollett@turnbullfirm.com

Uber Technologies, Inc.
c/o Registered Agent CT Corporation
System
2 North Jackson St., Suite 605
Montgomery, Alabama 36104

s/ Joseph E. Stott
OF COUNSEL